

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

JANE DOE	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 1:22-cv-00545 (CMH/TCB)
	:	
CENK SIDAR	:	
	:	
Defendant.	:	

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**DECLARATION**

The undersigned, Cenk Sidar, pursuant to 28 U.S. Code § 1746, submits the following declaration in response to Walter Steimel, Jr.’s Affidavit Regarding Pseudonym Allegations (ECF No. 31-1).

1. I am over the age of 18 and competent to testify.
2. I have personal knowledge of the facts relevant to this matter.
3. I have reviewed Mr. Steimel’s affidavit (ECF No. 31-1) and am familiar with its contents.
4. Even though it is disputed by Mr. Steimel, but notably not Mr. Urban, upon whom I attribute it to, I stand by my statement that Mr. Urban said to me: “You are a businessman, you are married, and have kids, and don’t want this to be a major issue for you, so why don’t you just do what we ask you to do and provide DNA?”
5. I was also reminded that I was a “married man with kids,” so I should “work with” them.

6. Despite Mr. Steimel's assertion in Paragraph 14 of his Affidavit, I did not say "don't think I penetrated her;" rather I stated I *didn't* penetrate her.

7. Despite Mr. Steimel's assertion in Paragraph 15 of his Affidavit, I was not told "that there was DNA on Jane Doe's pajamas."

8. It is unclear why Plaintiff's counsel did not have contact information for me, as stated in Paragraph 5 of Mr. Steimel's affidavit, as I have had the same phone number for over fifteen years and Plaintiff was in possession of my phone number.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 28, 2022.

  
Cenk Sidar